

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT GREENEVILLE**

UNITED STATES OF AMERICA,)	
)	
v.)	CASE NO. 2:20-CR-74-001
)	
CHARLES ELSEA, JR.,)	JUDGE GREER
Defendant.)	

**UNOPPOSED SECOND MOTION FOR EXTENSION OF TIME
TO FILE PRETRIAL MOTIONS and TRIAL DATE**

Comes now the Defendant, CHARLES ELSEA, JR., by and through counsel, and respectfully moves this Honorable Court for an extension of time to file pretrial motions and trial date. In support of this motion, the Defendant would show the following:

1. That pretrial motions are due on July 30, 2021, and the trial is set for September 21, 2021 at 9:00a.m.
2. That failure to grant this continuance would deny counsel for Mr. Elsea the reasonable time necessary for effective preparation, taking into account the exercise of due diligence, in light of delays and limited contact with both the defendant and potential witnesses due to the COVID-19 pandemic. Pursuant to 18 U.S.C. § 3161(h)(7)(b)(iv), counsel needs the additional time to investigate potential defenses of the case, to conduct witness interviews and other trial preparation, to investigate and file pretrial motions if warranted, and to otherwise effectively defend Mr. Elsea against these charges.
3. That it is in the best interest of justice to allow the Defendant, in light of the COVID-19 pandemic, sufficient time to negotiate with the government, review the discovery,

additional records, full criminal history, and caselaw with defense counsel before motions are submitted with the Court.

4. That counsel has discussed said motion with AUSA Meghan Gomez, and she does not oppose this motion.

For all of these reasons, the Defendant respectfully requests that this Honorable Court for additional time to file pretrial motions and for trial.

Respectfully submitted this 28th day of July, 2021.

CHARLES ELSEA, JR.
By Counsel

/s/Jonathan Sevier Cave #027139
Attorney for the Defendant
The Cave Law Firm, PLLC
104 N. College Street
Greeneville, TN 37743
(423) 638-5892

CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of July, 2021, I filed the foregoing Motion with the Clerk of the Court via the CM/ECF system which will send notification of such filing to all other interested parties.

/s/ Jonathan Sevier Cave
Attorney